

Christopher Angius (OR SBN 84157) (admitted in Northern District)
 Chung-Han Lee (SBN 231950)
 HOLLAND & KNIGHT LLP
 50 California Street, 28th Floor
 San Francisco, California 94111
 Telephone: (415) 743-6900
 Facsimile: (415) 743-6910

Attorneys for Defendant
 MAYTAG CORPORATION



UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN JOSE DIVISION

STATE FARM GENERAL INSURANCE
 CO.,

Plaintiff,

vs.

MAYTAG CORPORATION; FRY'S
 ELECTRONICS, INC., and DOES 1 through
 50, inclusive,

Defendants.

No. C04-02990 JW (HRL)

**STIPULATED REQUEST FOR ORDER
 CHANGING TIME AND ~~PROPOSED~~
 ORDER**

**[DECLARATION OF CHUNG-HAN LEE
 FILED CONCURRENTLY HEREWITH]**

The parties make this stipulated request for an order changing time pursuant to Local Rule 6-2.

On December 1, 2004, the Court issued its initial Scheduling Order for this case providing various deadlines for the completion of expert discovery, all discovery and dispositive motions. In the Scheduling Order Order, the Court provided the following deadlines:

Disclosure of Expert Witnesses	July 1, 2005
Disclosure of Rebuttal Expert Witness	July 11, 2005
Motions to Exclude Expert Testimony	August 22, 2005, 9:00 a.m.
Close of Discovery	August 31, 2005
Last Day for Hearing Dispositive Motions	October 17, 2005, 9:00 a.m.

1 Preliminary Pretrial Statement November 14, 2005
 2 Preliminary Pretrial and Trial Setting Conference November 28, 2005, 11:00 a.m.
 3 Since the Court issued its initial Scheduling Order, the parties have been actively engaged in both
 4 fact and expert discovery. Due to the vacation and work schedules of some of the expert witnesses,
 5 the expert witnesses may not be able to complete their expert reports by the current July 1, 2005
 6 deadline. Therefore, the parties now seek a two week extension for the disclosure of expert
 7 witnesses from July 1, 2005 to July 15, 2005.

8 Due to the extension for expert witness disclosures, the parties stipulate and respectfully
 9 request that the Court amend the Scheduling Order to provide the following deadlines:

10	Disclosure of Expert Witnesses	July 15, 2005
11	Disclosure of Rebuttal Expert Witness	August 15, 2005
12	Motions to Exclude Expert Testimony	October 3, 2005, 9:00 a.m.
13	Close of Discovery	October 14, 2005
14	Last Day for Hearing Dispositive Motions	December 5, 2005, 9:00 a.m.
15	Preliminary Pretrial Statement	January 23, 2006
16	Preliminary Pretrial and Trial Setting Conference	February 6, 2006, 11:00 a.m.

17 The parties note that no previous time modifications have been made in this case other than the
 18 change in the date by which mediation was to take place. This postponement in the expert
 19 disclosure deadline and the other discovery and dispositive motion deadlines will not significantly
 20 delay the trial as no trial date has yet been set, and the modifications in the scheduling order extends
 21 the deadlines by only a few months.

22 Pursuant to L.R. 6-2, this Stipulated Request is accompanied by the Declaration of Chung-
 23 Han Lee filed concurrently hereto.

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Respectfully submitted,
HOLLAND & KNIGHT LLP

Dated: June 24, 2005

/s/
CHUNG-HAN LEE
Attorney for Defendants
Maytag Corporation and Fry's Electronics

GRUNSKY EBEL FARRAR & HOWELL

Dated: June 24, 2005

/s/
REBECCA CONNOLLY
Attorney for Plaintiff
State Farm General Insurance Company

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 7/7/05

/s/ James Ware
HON. JAMES WARE
United States District Judge

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